

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA	:	CASE NO. 1:16-cr-193-SM
	:	
Plaintiff	:	(Judge Steven J. McAuliffe)
	:	
vs.	:	
	:	
WILLIAM SUMMERS	:	
	:	
Defendant	:	

**DEFENDANT, WILLIAM SUMMERS, ASSENTED TO MOTION
TO CONTINUE SENTENCING SCHEDULED FOR APRIL 3, 2019 TO A DATE
SUBSEQUENT TO APRIL 22, 2019**

William Summers, through his attorneys, H. Louis Sirkin and Jaye L. Rancourt, moves to continue the sentencing date currently set for April 3, 2019 to a date subsequent to April 22, 2019.

1. The undersigned counsel represent Defendant. H. Louis Sirkin is lead trial counsel appearing pro hac vice with Jaye L. Rancourt acting as local counsel.
2. This assented to request for continuance is based upon the recent trial and motion schedule of pro hac vice counsel, H. Louis Sirkin, which has consumed a considerable amount of time in court and preparation for court. Specifically a recent jury trial, State of Ohio v. Billy Ray Adams, III, case number 2018-CR-0043, Greene County, Ohio and a scheduled motion hearing in City of Fairfield, Ohio v. Tracey Abraham, case number 2019 CRB 00078, Fairfield, Ohio. As a result of the foregoing counsel is unable to effectively prepare for the sentencing hearing scheduled for April 3, 2019.
3. Counsel for the government assents to the continuance requested.

4. A Waiver of Speedy Trial will be filed with the clerk within seven (7) days of the granting of this motion.

WHEREFORE, the Defendant requests that this Court grant a continuance of the sentencing date to a date subsequent to April 22, 2019.

Respectfully submitted,

William Summers, by his attorney,

/s/ H. Louis Sirkin

H. Louis Sirkin, Esq. (pro hac vice)

Santen & Hughes, LPA

600 Vine Street, Suite 2700

Cincinnati, Ohio 45202

Tel: (513) 721-4450/ Fax: (513) 852-5994

Ohio Bar # 0024573

Email: hls@santen-hughes.com

Lead Counsel for Defendant William Summers

/s/ Jaye L. Rancourt

Jaye Rancourt

Brennan Lenahan Iacopino & Hickey

85 Brook Street

Manchester, New Hampshire 03104

Tel: (603) 668-8300/ Fax: (603) 668-1029

Email: jrancourt@brennanlenahan.com

Local Counsel for Defendant William Summers

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Assented to Motion to Continue Sentencing* has this day been electronically mailed to Seth Aframe, counsel for the government.

/s/ H. Louis Sirkin

H. Louis Sirkin (Ohio Bar No. 0024573)